A20 981 455 815 AZD 980 814 275 H20 980 885 36-AZP 982 301 547 AZD 982 471 096 AZP 020 132 502

1 GRANT WOODS Attorney General 2 JAMES T. SKARDON 3 State Bar No. 006973 Assistant Attorney General 4 1275 West Washington Phoenix, Arizona 85007 5 Phone: (602) 542-1610 6 Attorneys for Plaintiff 8 STATE OF ARIZONA SUPERIOR COURT 9 MARICOPA COUNTY 10 11 STATE OF ARIZONA, by and through . 12 EDWARD Z. FOX, Director, Arizona Department of Environmental Quality,) No. CV 90-26811 13 and GRANT WOODS, Attorney General, PLAINTIFF'S REQUEST 14 Plaintiff, FOR ADMISSION 15 -vs-16 TALLEY DEFENSE SYSTEMS, INC., a Delaware Corporation, 17 Defendant. 18 19 Pursuant to Arizona Rule of Civil Procedure 36, Plaintiff 20 State of Arizona hereby submits its Request for Admission to 21 Defendant Talley Defense Systems, Inc. 22 23 REQUEST FOR ADMISSION 24 25

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Admit that Talley Defense Systems, Inc. violated the

hazardous waste rules, Arizona Administrative Code R18-8-260, et

I seq., promulgated pursuant to the Arizona Hazardous Waste 2 Management Act, A.R.S. §§ 49-901, et seg. 3 4 RESPONSE: 5 6 Talley Defense Systems, Inc. admits, only for purposes of settlement of the pending action and not for any other purpose, that it or its employees violated the rules promulgated pursuant to the Arizona Hazardous Waste Management Act as they are 8 construed by the Arizona Department of Environmental Quality. DATED this 30ty day of Acrost 9 10 GRANT WOODS Attorney General 11 12 13 James T. Skardon 14 Assistant Attorney General 1275 W. Washington 1.5 Phoenix, Arizona 85007 Attorneys for Plaintiff 16 RESPONSE DATED this 304 17 18 KIMBALL & CURRY, P.C. 19 20 21 David P. Kimball, J. Stanton Curry. / Esq. 22 2600 N. Central, Suite 1600 Phoenix, Arizona 85004 23 Attorneys for Defendant Talley Defense Systems, Inc. 24

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